



{In Archive} Re: Fw: Clarification re: need for CORMIX modeling by TOPS 

Maria Okpala to: Rob Lawrence

03/18/2009 04:49 PM

Cc: Brian Mueller, Js Wilson, Patrick Rankin, Willie Lane

From: Maria Okpala/R6/USEPA/US

To: Rob Lawrence/R6/USEPA/US@EPA,

Cc: Brian Mueller/R6/USEPA/US@EPA, Js Wilson/DC/USEPA/US@EPA, Patrick Rankin/R6/USEPA/US@EPA, Willie Lane/R6/USEPA/US@EPA

History: This message has been replied to.

Archive: This message is being viewed in an archive.

I have no reason not to require them to do it since loop did it. Scott and Brian are experienced Cormix modelers. I have attached a copy of LOOP Cormix Model report. I am available for a conference call anytime on Thursday, but not Friday. Thanks



Cormix Model Report - LOOP.pdf

Maria Okpala
NPDES Permits Branch - Permits & Technical Section
EPA, Region 6 - Dallas, TX
okpala.maria@epa.gov
Phone: 214 665-3152
Fax: 214 665-2191

Re: Fw: Clarification re: need for CORMIX modeling by TOPS



Re: Fw: Clarification re: need for CORMIX modeling by TOPS 

Rob Lawrence to: Maria Okpala

03/18/2009 04:31 PM

Cc: Brian Mueller, Js Wilson, Patrick Rankin, Willie Lane

Maria - can we reach a regional position on the need for the modeling? To date, I have no over-riding reason not to require it. That is especially true as LOOP had to do so. That seems to maintain a level playing field.

If/when we reach internal agreement, can we have a conference call with the Coast Guard and the applicant? I am available pretty much any time on Thursday or Friday. I will need some time to give notice to the Coast Guard and for them to contact the applicant.

Rob Lawrence
Senior Policy Advisor - Energy Issues

lawrence.rob@epa.gov

214.665.6580 (Desk)
214.665.7263 (FAX)

Re: Fw: Clarification re: need for CORMIX modeling by TOPS



Re: Fw: Clarification re: need for CORMIX modeling by TOPS 

Maria Okpala to: Js Wilson

03/18/2009 11:23 AM

Cc: Brian Mueller, Patrick Rankin, Rob Lawrence, Willie Lane

Hi Scott,

We are all fine here. The requested document is attached. According to the application, vessels will require the intake of seawater for ballast during the discharge of product and cooling to supply the ships' cooling water intakes.

[attachment "EPA NPDES Call Summ 091708.pdf" deleted by Rob Lawrence/R6/USEPA/US]

Maria Okpala
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Re: Fw: Clarification re: need for CORMIX modeling by TOPS

Re: Fw: Clarification re: need for CORMIX modeling by TOPS 

Js Wilson to: Maria Okpala

03/18/2009 08:43 AM

Cc: Brian Mueller, Patrick Rankin, Rob Lawrence, Willie Lane

Hi Maria,

I hope all is good there. If possible, I would like to see the document they attached to the email so I can understand their side of the issue better. However, my guess is that if hydrostatic test water was modeled for the LOOP permit, it really should be done for this case too. I'm not entirely sure what other discharges the facility would have. Could you **also confirm whether** "carrier cooling water" is cooling water from ships carrying crude or not? Since I think TOPS would be located more than three miles offshore, discharges incidental to the normal operations if ships would not be something regulated under the NPDES permit. It probably would be something that should be looked at in the overall analysis of the effects of the facility under NEPA and Ocean Discharge Criteria though.

Scott Wilson, Energy Coordinator
Industrial Permits Branch (4203M)
Office of Wastewater Management
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW

Washington, DC 20460
202-564-6087

Maria Okpala

Scott,

03/18/2009 09:03:21 AM

From: Maria Okpala/R6/USEPA/US
To: Js Wilson/DC/USEPA/US@EPA
Cc: Brian Mueller/R6/USEPA/US@EPA, Willie Lane/R6/USEPA/US@EPA, Rob Lawrence/R6/USEPA/US@EPA, Patrick Rankin/R6/USEPA/US@EPA
Date: 03/18/2009 09:03 AM
Subject: Fw: Clarification re: need for CORMIX modeling by TOPS

Scott,

Good morning. We were informed that you had conversation with a Texas Offshore Port System(TOPS) representative that CORMIX modeling would not be required as part of their NPDES application. TOPS is pushing back on not performing this modeling based on the conversation you had with them. LOOP, a similar facility, performed this modeling and were re-issued an NPDES/LPDES permit last year. Can you clarify on this? Thanks!

Maria Okpala
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----- Forwarded by Maria Okpala/R6/USEPA/US on 03/18/2009 07:49 AM -----



Re: Fw: Clarification re: need for CORMIX modeling by TOPS 

Rob Lawrence to: Patrick Rankin

03/17/2009 05:51 PM

Cc: Brian Mueller, Maria Okpala, Willie Lane

Not yet. When the company pushed back on the Coast Guard a couple of weeks ago, it was noted that LOOP had recently done the modeling and there was no good reason not to perform the modeling, especially since it is a new permitte.

Patrick Rankin

----- Original Message -----

From: Patrick Rankin
Sent: 03/17/2009 05:31 PM CDT
To: Rob Lawrence
Cc: Brian Mueller; Maria Okpala; Willie Lane
Subject: Re: Fw: Clarification re: need for CORMIX modeling by TOPS

Has anybody asked Scott?

Fw: Clarification re: need for CORMIX modeling by TOPS



Fw: Clarification re: need for CORMIX modeling by TOPS



Rob Lawrence to: Maria Okpala, Willie Lane, Brian Mueller

03/17/2009 02:05 PM

Cc: Patrick Rankin

Maria, Brian and Willie - TOPS is still contending that they do not need to run CORMIX for their NPDES permit application. It seems that they are basing their position on a conversation with Scott last fall. I would point out that nothing in the attached "record of conversation" says anything about CORMIX.

If it is true that LOOP recent NPDES permit re-issuance including the modeling, I do not see why TOPS would not also need to carry out the modeling. The company has cited LOOP as the type of facility they are proposing off Houston.

The Coast Guard would like to hold a conference call with TOPS and their support contractor on this topic. Are you available tomorrow afternoon, Thursday morning or any time on Friday?

Rob Lawrence
Senior Policy Advisor - Energy Issues

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----- Forwarded by Rob Lawrence/R6/USEPA/US on 03/17/2009 01:58 PM -----



FW: Clarification re: need for CORMIX modeling

McKittrick, Bradley to: Rob Lawrence

03/17/2009 01:54 PM

Sent by: **Bradley.K.McKittrick@uscg.mil**
Cc: "Martin, Raymond"

Hi Rob,

As per our short phone conversation, TOPS is questioning the need to do run CORMIX for the NPDES permit. They are citing a call with Scott Wilson (EPA). The text is capture in the attached doc and further discussed in the email below.

If possible I would like to have a conf call with EPA and TOPS to resolve this issue.

Regards,

Brad

Bradley K. McKittrick
Environmental Protection Specialist
US Coast Guard (CG-5225)
Deepwater Ports Standards Division

Phone (202) 372-1443

From: Silva, Tony [mailto:Tony.Silva@aecom.com]
Sent: Monday, March 16, 2009 3:43 PM
To: Cain, Peter
Cc: Hollingsworth, Jamey
Subject: Clarification re: need for CORMIX modeling

Peter,

As we discussed early today, I believe there is still an outstanding question regarding the requirement for CORMIX modeling. During last Wednesday's conference call it was indicated that the CORMIX modeling would be required in support of the NPDES permit application for the project based on discussions with EPA.

Prior to developing the NPDES application (last September), I had a brief discussion regarding NPDES permitting with Scott Wilson of EPA, who is the EPA Region 6 water permitting contact (see attached telecon). I discussed the discharges that would be included in the NPDES application, indicating that they would include operational discharges from the platforms and construction phase hydrostatic test water discharges to federal waters. There was no indication during our call that crude carrier cooling water discharges would be included in the NPDES permit. EPA did find that the NPDES application submitted in support of the project was administratively complete, although they did reserve the right to request additional information once they have performed a formal technical review.

Platform discharges are all relatively small quantity flows and should not require CORMIX modeling to support their impact evaluation. It may well be that EPA is looking for CORMIX modeling of a representative crude carrier cooling water discharge in support of the overall project evaluation, but we should confirm this point. I think that perhaps a brief conference call with Brad McKittrick (USCG) might clarify the CORMIX modeling request issue. It might be appropriate to also include Elizabeth Dolezal (NRG) in on the discussion, but we can see what Brad wants to do with this initial discussion.

Thanks for your help with this.

regards,

tony silva

Anthony L. Silva, P.E.

Senior Environmental Engineer

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[attachment "EPA NPDES Call Summ 091708.pdf" deleted by Patrick Rankin/R6/USEPA/US]